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8 Attorney for Proposed Intervenor Media Coalition

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN JOSE DIVISION

12 UNITED STATES OF AMERICA

13 Plaintiff,

14 v.

15 ELIZABETH HOLMES and
16 RAMESH "SUNNY" BALWANI,

17 Defendants.

Case No. 18-cr-00258-EJD

**DECLARATION OF STEVEN D.
ZANSBERG IN SUPPORT OF MEDIA
COALITION'S ADMINISTRATIVE
MOTION TO FILE UNDEAR SEAL ITS
SUPPLEMENTAL REPLY IN SUPPORT
OF ITS MOTION TO UNSEAL
COMPLETED QUESTIONNAIRES OF
SEATED JURORS AND ALTERNATES**

Courtroom: 4, 5th Floor

Hon. Edward J. Davila

1 I, Steven D. Zansberg, declare as follows:

2 1. I represent the Media Coalition in the above-captioned matter. I submit this
3 declaration in support of the Media Coalition's Administrative Motion for Leave to File Under Seal
4 its Supplemental Reply in support of its Motion Seeking the Unsealing of Completed Questionnaires
5 of Seated Jurors and Alternates, which is the only document sought to be sealed.

6 2. The undersigned respectfully submits that sealed filing is warranted due to the sealed
7 nature of the transcripts cited in the unredacted version of Media Coalition's Supplemental Reply in
8 support of its Motion Seeking the Unsealing of the Completed Questionnaires of Seated Jurors and
9 Alternates.

10 3. A redacted version of the Media Coalition's Supplemental Reply in support of its
11 Motion Seeking the Unsealing of the Completed Questionnaires of Seated Jurors and Alternates
12 has been filed on the public docket.

13
14 DATED: November 1, 2021

15 /s/ Steven D. Zansberg

16 STEVEN D. ZANSBERG
17 Attorney for The Media Coalition

18 (American Broadcasting Companies, Inc. d/b/a ABC
19 News, the Associated Press, Bloomberg L.P., The Daily
20 Mail, Dow Jones and Company, Inc., NBCUniversal
21 Media, LLC, The New York Times Company, Portfolio
Media, Inc. – publisher of Law360, Three Uncanny Four
LLC, and the Washington Post Company)

22 **CERTIFICATE OF SERVICE**

23 I hereby certify that on November 1, 2021, a copy of this filing was delivered via ECF to all counsel
24 of record.

25 /s/ Steven D. Zansberg

26 STEVEN D. ZANSBERG

27
28 DECLARATION OF STEVEN D. ZANSBERG
IN SUPPORT OF MEDIA COALITION'S ADMINISTRATIVE
MOTION SEEKING LEAVE TO FILE UNDER SEAL
ITS SUPPLEMENTAL REPLY

CASE NO. 18-CR-00258-EJD